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12

13 **IN THE UNITED STATES DISTRICT COURT**
 14 **FOR THE DISTRICT OF ARIZONA**

15 Case No. 2:15-MD-02641-DGC

16
 17 IN RE: Bard IVC Filters Products Liability
 Litigation

18
 19 **DEFENDANTS C. R. BARD INC. AND**
BARD PERIPHERAL VASCULAR
INC.'S NOTICE OF SERVICE OF
CASE-SPECIFIC EXPERT
DISCLOSURES RELATED TO TINLIN
MATTER

20 (Assigned to the Honorable David G.
 Campbell)

21 **(Tinlin Bellwether Case)**

22
 23 Pursuant to Amended Case Management Order No. 39, filed November 26, 2018,
 24 Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc., by and through counsel,
 25 hereby give notice that on January 7, 2019,¹ they served on Plaintiffs, via U.S. Mail and

26
 27 ¹ Plaintiffs and Bard agreed to move the deadline for Bard's case-specific expert
 28 disclosures in the *Tinlin* matter to January 7, 2019.

1 email, the following written case-specific expert reports related to Bellwether Plaintiff
2 Debra Tinlin:

3 • Expert disclosure of Christine Brauer, Ph.D. Dr. Brauer submitted her
4 original MDL Report in April 2017, and her supplemental MDL Report concerning the
5 Meridian and Denali Filters in May 2017. At the time of those Reports, Dr. Brauer did not
6 have access to FDA's down-classification memoranda (the "Price Memos"). Accordingly,
7 Dr. Brauer has prepared a Supplemental Report dated July 17, 2018, that includes
8 reference and discussion of the Price Memos. Aside from formatting changes and
9 corrections of typographical errors, Dr. Brauer's Supplemental Report does not contain
10 any other new or different substantive information not previously disclosed in her prior
11 Reports. Dr. Brauer's July 2018 Supplemental Report also combines her original April
12 2017 MDL Report and her May 2017 Meridian and Denali Report to create a single
13 Report.

14 • Expert disclosure of Paul Briant, Ph.D., P.E.
15 • Expert disclosure of Audrey A. Fasching, Ph.D., P.E.
16 • Expert disclosure of Michael Miller, M.D.
17 • Expert disclosure of Christopher S. Morris, M.D.
18 • Expert disclosure of David S. Owens, M.D.
19 • Expert disclosure of Piotr S. Sobieszczyk, M.D.
20 • Expert disclosure of Donna Bea Tillman, Ph.D., M.P.A. Dr. Tillman
21 submitted her original MDL Report in April 2017, and her supplemental MDL Report
22 concerning the Meridian and Denali Filters in May 2017. At the time of those Reports, Dr.
23 Tillman did not have access to FDA's down-classification memoranda (the "Price
24 Memos"). Accordingly, Dr. Tillman has prepared a Supplemental Report dated July 12,
25 2018, that includes reference and discussion of the Price Memos. Aside from formatting
26 changes and corrections of typographical errors, Dr. Tillman's Supplemental Report does
27 not contain any other new or different substantive information not previously disclosed in
28

1 her prior Reports. Dr. Tillman's July 2018 Supplemental Report also combines her
2 original April 2017 MDL Report and her May 2017 Meridian and Denali Report to create
3 a single Report.

4 DATED this 7th day of January, 2019.

5
6 */s/ Richard B. North, Jr.* _____

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27 **Attorney for Defendants C. R. Bard, Inc. and**
28 **Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 7, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/Richard B. North, Jr.

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